

# EXHIBIT D

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

CHAD PELISHEK,

Plaintiff,

-vs-

Case No. 2:23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

Examination of CHARLES ADAMS, taken at  
the instance of the Plaintiff, under and pursuant to  
the Federal Rules of Civil Procedure, before Dawn M.  
Lahti, a Certified Realtime Reporter, Registered  
Professional Reporter and Notary Public in and for  
the State of Wisconsin, at MWH Law, 735 North Water  
Street, Milwaukee, Wisconsin, on October 31, 2024,  
commencing at 9:00 a.m. and concluding at 2:05 p.m.

1 Q Were you at the event?

2 A That event, no.

3 Q Did you hear anything about anything that  
4 happened, or do you know about any discipline?

5 A No.

6 MR. BULIOX: Objection to the extent  
7 it calls for speculation.

8 THE WITNESS: I don't know anything  
9 about any discipline.

10 BY MS. DeMASTER:

11 Q There wasn't any -- was there any discipline on  
12 anybody there?

13 A Well, the only person I'm aware of being  
14 involved in the negative activity would have  
15 been an alderperson, and we don't exercise  
16 discipline against alders. The alders might  
17 take their own action, and I'm not aware that  
18 they did.

19 Q So no non-alderperson was involved in anything  
20 inappropriate?

21 MR. BULIOX: Again, objection, and to  
22 the extent it's been asked and answered already  
23 in terms of his knowledge of the situation.

24 Go ahead and answer if you can.

25 THE WITNESS: I'm unaware of any

1 time, but I don't recall.

2 Q Do you have an estimate?

3 A It may have been in the course of a day. It  
4 may have been a few days. I don't recall.

5 Q So you decided it was responsive and that it  
6 should be published?

7 A In the end, I made that final decision, yes.

8 Q And you made that decision after Chad Pelishek  
9 told you that he was worried about his name  
10 being published in conjunction with that  
11 investigation, correct?

12 MR. BULIOX: Objection. Form.

13 Assumes facts not established and discussed.

14 But subject to that, you can answer.

15 MS. DeMASTER: I can rephrase.

16 BY MS. DeMASTER:

17 Q Did Chad Pelishek ever make any comment to you  
18 or at a management meeting that he was worried  
19 about his name coming out in the report?

20 A I don't recall that comment.

21 Q Does the city use the Adobe program?

22 A Adobe Acrobat are you talking about?

23 Q Sure. Any Adobe program. What about opening  
24 PDFs?

25 A Sure. Adobe is like the PDF program.

1 and Dylan Detloff.

2 Q Did you publish that investigation to the  
3 public?

4 A The investigation itself, no.

5 Q Did you publish the allegations about him to  
6 the public?

7 A No.

8 Q Did you publish Adam Westbrook was being  
9 investigated for misconduct?

10 A No.

11 Q Were you aware that Adam Westbrook was a  
12 homosexual?

13 A Yes.

14 Q Did you ever advise the council that outside  
15 council should investigate the complaints by  
16 Mr. Arenz?

17 A No.

18 Q You chose to take this one yourself?

19 A This one I chose to take myself, yes.

20 Q You kept that confidential and private?

21 A Correct.

22 Q Did you see a draft of Jill Hall's  
23 investigation report, the written report before  
24 it was finalized?

25 A Before it was finalized, no.